

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

In re:

GLOBAL CLEAN ENERGY  
HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

---

)  
) Chapter 11  
)  
) Case No. 25-90113 (ARP)  
)  
)  
) (Jointly Administered)  
)

---

**DEBTORS' AGENDA OF MATTERS SET FOR VIRTUAL HEARING  
ON APRIL 16, 2025 AT 11:00 A.M. (PREVAILING CENTRAL TIME)**

---

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file this agenda of matters set for virtual hearing on April 16, 2025 at 11:00 a.m. (prevailing Central Time) before the Honorable Judge Alfredo R. Pérez, United States Bankruptcy Judge, Courtroom 400, 515 Rusk Street, Houston, Texas 77002:

**I. Evidentiary Support for First Day Pleadings.**

1. Notice of Virtual Hearing on First Day Motions [Docket No. 40].
2. Declaration of Noah Verleun, Chief Executive Officer of Global Clean Energy Holdings, Inc., in Support of the Debtors’ Chapter 11 Petitions [Docket No. 2].
3. Declaration of John Walsh, Managing Director of Alvarez & Marsal North America, LLC, in Support of the Debtors’ First Day Motions [Docket No. 3].

---

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/GCEHoldings>. The location of Debtor Global Clean Energy Holdings, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is: 6451 Rosedale Highway, Bakersfield, California 93308.

4. Declaration of John Walsh in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Credit, (B) Grant Senior Secured Liens and Superpriority Administrative Expense Claims, and (C) Utilize Cash Collateral; (II) Granting Adequate Protection to Prepetition Parties; (III) Modifying the Automatic Stay; (IV) Authorizing the Continuation of the Prepetition SOA and SSA, as Amended, (V) Authorizing the Debtors to Enter Into and Perform Under Postpetition Transactions Under the SOA and SSA; (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 18].
5. Declaration of Christian Tempke in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Credit, (B) Grant Senior Secured Liens and Superpriority Administrative Expense Claims, and (C) Utilize Cash Collateral; (II) Granting Adequate Protection to Prepetition Parties; (III) Modifying the Automatic Stay; (IV) Authorizing the Continuation of the Prepetition SOA and SSA, as Amended, (V) Authorizing the Debtors to Enter Into and Perform Under Postpetition Transactions Under the SOA and SSA; (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 17].
6. Debtors' Witness and Exhibit List for First Day Hearing on April 16, 2025 [Docket No. 39].
7. Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 5].

## **II. First Day Motions.**

1. Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of the Debtors' Chapter 11 Cases and (II) Granting Related Relief [Docket No. 4].

Status: Order entered at Docket No. 27.

2. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Credit, (B) Grant Senior Secured Liens and Superpriority Administrative Expense Claims, and (C) Utilize Cash Collateral; (II) Granting Adequate Protection to Prepetition Parties; (III) Modifying the Automatic Stay; (IV) Authorizing the Continuation of the Prepetition SOA and SSA, as Amended, (V) Authorizing the Debtors to Enter Into and Perform Under Postpetition Transactions Under the SOA and SSA; (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 16].

Status: This matter is going forward.

3. Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (II) Continue Employee Benefits Programs, and (III) Granting Related Relief [Docket No. 7]

Status: This matter is going forward.

4. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(B)(9) Claimants, (B) Lien Claimants, (C) Critical Vendors, and (D) USDA Grant Vendors, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 8].

Status: This matter is going forward.

5. Debtors' Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing, and Solicitation Agent [Docket No. 6].

Status: This matter is going forward.

6. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Using Their Cash Management System, (B) Maintain Existing Bank Accounts, Business Forms, and Books and Records, and (C) Continue Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Transactions, and (III) Granting Related Relief [Docket No. 13].

Status: This matter is going forward.

7. Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [Docket No. 14].

Status: This matter is going forward.

8. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Natural Persons, (II) Waiving the Requirement to File a List of Equity Security Holders, (III) Approving the Form and Manner of Notifying Creditors of the Commencement of the Chapter 11 Cases and Other Information, and (IV) Granting Related Relief [Docket No. 15].

Status: This matter is going forward.

9. Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File (A) Schedules and Statements and (B) Rule 2015.3 Financial Reports, (II) Modifying the Requirements of Bankruptcy Local Rule 2015-3, and (III) Granting Related Relief [Docket No. 9].

Status: This matter is going forward.

10. Debtors' Emergency Motion For Entry of an Order (I) Authorizing the Debtors to (A) Maintain Insurance and Surety Coverage Obtained Prepetition and Pay Prepetition Obligations Related Thereto, (B) Honor and Renew the Premium Financing Agreements Entered Into Prepetition (C) Continue to Pay Brokerage Fees, and (D) Renew, Amend, Supplement, Modify, Extend, or Purchase Insurance Policies and Surety Bonds, and (II) Granting Related Relief [Docket No. 10].

Status: This matter is going forward.

11. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. 11].

Status: This matter is going forward.

12. Debtors' Emergency Motion for Entry of an Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [Docket No. 12].

Status: This matter is going forward.

13. Debtors' Emergency Motion for Entry of an order Authorizing the Debtors to Redact and File the Unredacted Supply and Offtake Agreement Under Seal [Docket No. 19].

Status: This matter is going forward.

*[Remainder of page intentionally left blank]*

Houston, Texas  
Dated: April 16, 2025

*/s/ Jason L. Boland*

---

**NORTON ROSE FULBRIGHT US LLP**

Jason L. Boland (SBT 24040542)  
Robert B. Bruner (SBT 24062637)  
Julie Harrison (SBT 24092434)  
Maria Mokrzycka (SBT 24119994)  
1550 Lamar Street, Suite 2000  
Houston, Texas 77010-3095  
Telephone: (713) 651-5151  
Facsimile: (713) 651-5246  
Email: jason.boland@nortonrosefulbright.com  
bob.bruner@nortonrosefulbright.com  
julie.harrison@nortonrosefulbright.com  
maria.mokrzycka@nortonrosefulbright.com

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Joshua A. Sussberg, P.C. (*pro hac vice* pending)  
Brian Schartz, P.C. (TX Bar No. 24099361)  
Ross J. Fiedler (*pro hac vice* pending)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: jsussberg@kirkland.com  
bschartz@kirkland.com  
ross.fiedler@kirkland.com

- and -

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Peter A. Candel (*pro hac vice* pending)  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: peter.candel@kirkland.com

*Proposed Co-Counsel to the Debtors  
and Debtors in Possession*

*Proposed Co-Counsel to the Debtors  
and Debtors in Possession*

**Certificate of Service**

I certify that on April 16, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Additionally, the foregoing document will be served as set forth in a forthcoming affidavit filed by the Debtors' proposed claims agent.

/s/ Jason L. Boland

Jason L. Boland